

THE ROSEN LAW FIRM, P.A.

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[Proposed] Lead Counsel for Plaintiffs

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
YINGLU YAO, INDIVIDUALLY AND ON
BEHALF OF ALL OTHERS SIMILARLY
SITUATED,

Plaintiff,

vs.

FUWEI FILMS (HOLDINGS) CO., LTD., XIAOAN
HE, JUN YIN, DUO WANG, TONGJU ZHOU,

Defendants.

Case No.: 07-CV-9416 (RJS)

CLASS ACTION

**NOTICE OF MOTION TO: (1)
CONSOLIDATE RELATED ACTIONS;
(2) APPOINT LEAD PLAINTIFF; AND
(3) APPROVE LEAD PLAINTIFF'S
SELECTION OF COUNSEL**

-----X
MEIRA RUBIN, INDIVIDUALLY AND ON
BEHALF OF ALL OTHERS SIMILARLY
SITUATED,

Plaintiff,

vs.

FUWEI FILMS HOLDINGS CO., LTD., XIAOAN
HE, LIN TANG, MARK E. STULGA, TONGJU
ZHOU, DUO WANG, JUN YIN, MAXIM GROUP
LLC, CHARDAN CAPITAL MARKETS LLC, and
W.R. HAMBRECHT & CO., LLC,

Defendants.

Case No.: 07-CV-10323 (RJS)

CLASS ACTION

-----X

PLEASE TAKE NOTICE that pursuant to Section 27(a)(3)(B) of the Securities Act of 1933 (the “Securities Act”), as amended by the Private Securities Litigation Reform Act of 1995 (the “PSLRA”), Nijat Tonyaz hereby moves this Court, the Honorable Richard J. Sullivan, United States District Judge, for an order:

- (a) consolidating above-captioned related actions;
- (b) appointing the Nijat Tonyaz to serve as Lead Plaintiff in this action; and
- (c) approving Nijat Tonyaz’ selection of The Rosen Law Firm, P.A. as Lead Counsel for the litigation.

In support of this Motion, Movant submits: (1) the Declaration of Phillip Kim dated December 18, 2007 (with exhibits); (2) Memorandum of Law dated December 18, 2007; and (3) a [Proposed] Order granting Nijat Tonyaz’ Motion for appointment as Lead Plaintiff, and approving Lead Plaintiff’s selection of Counsel.

Respectfully submitted,

Dated: December 18, 2007

THE ROSEN LAW FIRM, P.A.

/s/ Phillip Kim
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[Proposed] Lead Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on this on the 18th Day of December, 2007, a true and correct copy of the foregoing NOTICE OF MOTION TO: (1) CONSOLIDATE RELATED ACTIONS; (2) APPOINT LEAD PLAINTIFF; AND (3) APPROVE LEAD PLAINTIFF'S SELECTION OF COUNSEL was served by CM/ECF to the parties registered to the Court's CM/ECF system.

/s/ Phillip Kim